

SOUTH DELTA WATER AGENCY

4255 PACIFIC AVENUE, SUITE 2
STOCKTON, CALIFORNIA 95207
TELEPHONE (209) 956-0150
FAX (209) 956-0154
E-MAIL Jherrlaw@aol.com

Directors:

Jerry Robinson, Chairman
Robert K. Ferguson, Vice-Chairman
Natalino Bacchetti
Jack Alvarez

Engineer:

Alex Hildebrand
Counsel & Manager:
John Herrick

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Via E-Mail dv_context@calwater.ca.gov

Delta Vision Blue Ribbon Task Force
650 Capitol Mall, 5th Floor
Sacramento, CA 95814

Ladies/Gentlemen:

We are writing to provide an initial technical response to your invitation for constructive comment on the June 18 Preliminary Staff Draft of a Delta Vision Strategic Plan.

The length and breath of the Draft attest to the complexity of the subject, and the long range difficulty of restoring and protecting the Delta while also providing an adequate California water supply as the population grows. However, much of the draft is little more than an unrealistic wish list by people with different knowledge bases and perspectives. It includes conceptual solutions to various perceived needs without regard to compatibility or feasibility, or the extent to which the compatible measures could collectively achieve the strategic goals. It also fails to identify the technical analyses needed to determine whether a dual facility would be a viable solution.

For example, page 7 and Action 4.1 on page 29 and elsewhere propose that a large part of the Delta's agriculture be converted to various kinds of wetland and upland habitat. There is no discussion of the fact that this would reduce the developed water supply because open water and wetlands consume much more water pre acre than farmlands. There is no discussion of the consumptive use of water in the Delta. There is no discussion of whether the remaining farms could survive if there is no longer enough business for food processors, and farm service organization to be viable. There is no discussion of the pros and cons of destroying agriculture in the Delta or elsewhere when we have 5 million more people to feed every ten years. Agricultural Code 411 says we must have a sufficient farm water supply so that we don't become dependent on a net import of food. The State Water Plan ignores this legislated policy. Will the Vision Plan also ignore it? How does the Strategic Plan decide what laws and water rights to honor and which to ignore.

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Page 35 proposes large controlled increases in outflow to the Bay. There is no discussion of the source of this water.

In discussing the need for a reliable California water supply there seems to be an unexplained assumption that part of that supply must derive from intercepting a substantial part of the remaining but reduced Delta inflow, and exporting it through an isolated canal. Yet it is stated on page 41 that “the surest path to supply reliability is through regional self sufficiency ---” On page 59, Action 9.2 it is acknowledged that exports from the Delta should be reduced in low river inflow conditions and increased in high outflow situations. It is not clearly stated that this increases the developed water supply by capturing excess Delta outflow.

On Action 9.1 page 58 it is proposed to implement a “Middle River Conveyance” system. This is similar to the In-Delta Comprehensive Water Management Plan presented to the Task Force last October. That Plan was then never discussed or mentioned in Task force reports. There has been no discussion of considering the Plan as an alternative to a dual facility, rather than just an interim measure. The Delta Corridor portion of the Plan would keep San Joaquin fish away from screens. Our updated Plan would also correct the deadend feature of screening Sacramento and resident fish in water exported from the South Delta. We would create a flow of Sacramento water past the screens and discharge that flushing flow into the Old River Corridor.

The draft Strategic Plan still assumes that we can have a canal and also restore the Delta. This is not physically possible. The DWR’s May response to a question from the Vision Task Force admits that even with average rather than below average summer river flows, the Delta outflow would have to be reduced and X2 moved inland to get any increase in Delta exports by use of a canal. What effect will this have on the City of Antioch and on the ecology of Suisun March? DWR’s analysis is based on 2,000 cfs at Vernalis, but it was about 1,000 cfs in three of the last four years and was about 850 cfs last weekend.

A basic cause of our water problems is that the population has already outgrown the developed water supply. California is unsustainably overdrafting its groundwater by about two million acre feet per year. The fresh water inflow to the Delta from the Mokelumne and San Joaquin Rivers has been largely eliminated much of the time. This is the result of exports upstream of the Delta to the Tulare Basin, and to the Bay area. It also results from increased upstream consumptive use of water to grow food and provide urban needs for the growing population. We have about 5 million more Californians every ten years, but the 2005 State Water Plan makes no provision for the water that must be used consumptively to provide food for the increasing population. Researchers at U.C. Riverside have estimated that it takes about 0.75 acre feet of water consumed to grow an adequate and balanced food supply for each member of the public.

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Since the decrease in Delta inflow is a major cause of the problem, it is not logical to believe that we can solve the problem by using a canal to substantially further decrease inflow, and by destroying the dispersal of any remaining inflow through Delta channels, and by increasing exports from the Delta. The draft Plan does not discuss this.

A canal through the Delta would also divide the Delta into two parts. It would sever lands, farm roads, county roads, irrigation systems, drainage systems, levees, all but a few channels, recreational boating routes, etc. It would increase major flood stages by impeding flow across the canal. It would cause seepage problems, and require new fish screens. It would create problems for utilities, gas pipelines, and water pipelines to the Bay area. It would create blind sloughs with no circulation. The draft does not mention this.

On page 23 of the above mentioned May report by DWR to the Task Force it is acknowledged that DWR has not yet investigated the water quality and flow effects within Delta channels. When that is done for both average and low river flow conditions it will show that salinity will be too high for reliable crop production in the Delta south of the Sacramento channel. This will put farms out of business. Farmers are the primary maintainers of non-urban levees. When farming is destroyed, the levees will be abandoned and the Delta will convert to an open salty Bay. How will this affect fishery?

The draft Strategic Plan and the State Water Plan do not distinguish between proposals such as transfers which reallocate but do not increase water supply, and measures which do increase supply. The Plan does not distinguish between non-consumptive uses which can be, and are largely already recovered in the Central Valley, and consumptive uses which can not be recovered. Most of the man made consumptive use is for the production of food. This consumptive use requires far more water than all of the non-consumptive uses of water. Little can be done to decrease the amount of water that must be consumed to produce a pound of crop biomass. Pushing farmers to use drip irrigation will not reduce the consumptive water use. The non-consumed excess applied water is already largely recovered.

We recommend that the Strategic Plan be revised in respect to the above discussion and similar matters.

Thank you for your consideration.

Very truly yours,

Alex Hildebrand

cc: Sunne McPeak
John Herrick
Secretary Mike Chrisman